

RUFUS-ISAACS, ACLAND & GRANTHAM
By: Jacqueline Perry, Q.C. (State Bar No.: 218637)
Neil J. Fraser, Esq. (State Bar No.: 125651)
*232 North Canon Drive
Beverly Hills, California 90210*
Phone: (213) 324-4206
Fax: (310) 860-2430
E-Mail: neil53@mac.com/jperry@rufuslaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

NATTO IYELA GBARABE, etc..

Plaintiff:

VS

CHEVRON CORPORATION.

Defendant

CASE NO. 14-cv-00173-SI
(Assigned to Hon. Susan Illston,
Courtroom One)

**EXHIBITS IN SUPPORT OF MOTION
FOR CLASS CERTIFICATION.**

TABLE OF CONTENTS - EXHIBITS

EXHIBIT A

(A1)	VERDE: KS ENDEAVOR RIG BLOWOUT ENVIRONMENTAL ASSESSMENT (AUTHOR – KEVIN CLEARY)	1-10
(A2)	VERDE: THE KS ENDEAVOR BLOWOUT INCIDENT: RESIDUAL MARINE BENTHIC IMPACT ASSESSMENT (PHYSALIA APPLIED SCIENCES; AUTHORS – DR. S. J. FORSTER, DR. M. W. TRETT)	11-177
(A3)	VERDE: APPRAISAL REPORT ON MARINE SURVEY DATA FOR FUNIWA CRATER, NIGERIA (IRISH HYDRODATA LTD.; AUTHOR – J. F. WALSH)	178-195
(A4)	VERDE: KS ENDEAVOR PROJECT FACTUAL REPORT ON ANALYTICAL TESTING (JONES ENVIRONMENTAL LABORATORY; AUTHOR – ALAN WILSON)	196-484

EXHIBIT B

(B1)	SOCIO-ECONOMIC REPORT ON THE EFFECTS OF THE KS ENDEAVOR RIG EXPLOSION ON THE COASTAL COMMUNITIES OF BAYELSA (AUTHORS – PROF. E. J. ALAGOA, PROF. A. A. DEREFAKA, DR. A. M. OKOROBIA)	485-705
(B2)	SUMMARY OF POST IMPACT STUDIES AND FINDINGS ON THE EFFECT OF JANUARY 2012 CHEVRON GAS RIG EXPLOSION OFF THE ATLANTIC OCEAN (AUTHOR – PROF. JASPER FREEBORN ABOWEI)	706-723
(B3)	CURRICULUM VITAE – PROFESSOR EBIEGBERI JOE ALAGOA; EMERITUS PROFESSOR OF HISTORY, UNIVERSITY OF PORT HARCOURT	724-737
(B4)	CURRICULUM VITAE – PROFESSOR ABI A. DEREFAKA; DIRECTOR, UNIVERSITY OF PORT HARCOURT MUSEUM	738-739
(B5)	CURRICULUM VITAE – DR. ATEI MARK OKOROBIA; ACTING HEAD, DEPARTMENT OF HISTORY AND DIPLOMATIC STUDIES, UNIVERSITY OF PORT HARCOURT	740-741
(B6)	CURRICULUM VITAE – PROFESSOR JASPER FREEBORN ABOWEI; PROFESSOR OF BIOLOGICAL SCIENCE, NIGER DELTA UNIVERSITY	742-759

(B7) REFERENCE REPORTS OF PROFESSOR ABOWEI 760-790

EXHIBIT C

(C1)	DAMAGE MODEL FOR CLASS ACTION MANAGEMENT IN THE MATTER OF GBARABE V CHEVRON (HSNO; AUTHOR - CHRISTOPHER K. MONEY)	791-801
------	----------------------------------------------------------------------------------------------------------------------------	---------

EXHIBIT D

(D1)	DECLARATION OF NATTO IYELA GBARABE	802-817
(D2)	DECLARATION OF BEATRICE EZEKIEL	818-824
(D3)	DECLARATION OF BENJAMIN AYIBATONYE CHRISTOPHER	825-832
(D4)	DECLARATION OF CORNELIUS OLUMOFA.....	833-840
(D5)	DECLARATION OF DANIEL AWE	841-848
(D6)	DECLARATION OF EBIWEI BAGHEBO	849-858
(D7)	DECLARATION OF FESTUS ILEBERI.....	859-867
(D8)	DECLARATION OF IYADIMA DUODUO.....	868-875
(D9)	DECLARATION OF PETER AGU.....	876-883

EXHIBIT E

(E1)	DECLARATION OF ALAGOA MORRIS WITH ACCOMPANYING WRITTEN REPORTS, PHOTOGRAPHS, AND VIDEO STILLS	884-1018
(E2)	DECLARATION OF OBA NSUGBE, Q.C.	1019-1047
(E3)	DECLARATION OF EBIDESEGHABOFA JONAS FRANCIS	1048-1054
(E4)	DECLARATION OF HENRY (HARRY) HARPER	1055-1061
(E5)	FOREIGN JUDGMENTS (RECIPROCAL ENFORCEMENT) ACT OF 1990, NIGERIA	1062-1069

(E6) TELEVISION BROADCAST VIDEO STILLS, AFRICA TODAY, YENAGOA
..... **1070-1079**

(E7) NEW OIL SPILL, GAS LEAK FROM CHEVRON FIELD THREATENS
KOLUAMA COMMUNITY IN BAYELSA (SAHARA REPORTERS; AUGUST 15,
2013) **1080-1083**

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California, over the age of eighteen years and not a party to this action. My business address is 232 N. Canon Drive, California 90210.

On April 8, 2016, I served the following documents:

EXHIBITS IN SUPPORT OF MOTION FOR CLASS CERTIFICATION OF PLAINTIFF NATTO GBARABE

On the interested parties by serving:

JONES DAY

**555 California Street, 26th Floor
San Francisco, California 94104**

**Attn: ROBERT A. MITTELSTAEDT, ESQ. (ramittelstaedt@JonesDay.com)
CAROLINE N. MITCHELL, ESQ (cnmitchell@JonesDay.com)**

(_) By Mail: I caused such envelope to be deposited in the U.S. Mail at Beverly Hills, California, postage fully paid, in the usual and customary course of business.

(X) By E-Mail: I caused such document to be transmitted by e-mail to the persons specified above, with said transmission reported as completed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of April 2016 at Beverly Hills, California.

/S/
NEIL J. FRASER